



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**MAR 11 2011**

REPLY TO THE ATTENTION OF:

**LR-8J**

**CERTIFIED MAIL 7009 1680 0000 7667 0425**  
**RETURN RECEIPT REQUESTED**

Marc Muzzarelli  
Production Manager  
Mid-City Plating Company  
921 East Charles Street  
Muncie, Indiana 47305

Re: Notice of Violation  
RCRA Compliance Evaluation Inspection – Mid-City Plating Company  
EPA I.D. No.: IND 006 049 456

Dear Mr. Muzzarelli:

On June 22, 2010, a representative of the U.S. Environmental Protection Agency inspected the Mid-City Plating Company (Mid-City Plating) facility in Muncie, Indiana. The purpose of the inspection was to evaluate Mid-City Plating's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA) related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed.

Based on information provided by Mid-City Plating personnel, a review of records, and personal observations made by the inspector at the time of the investigation, EPA has determined that Mid-City Plating is in violation of hazardous waste regulations in the Indiana Administrative Code (IAC) and corresponding provisions in the United States Code of Federal Regulations (C.F.R.), as specified below.

To be eligible for the exemption from having a hazardous waste storage permit, Mid-City Plating must be in compliance with the conditions of 329 IAC § 3.1-7-1 [40 CFR § 262.34(a) and (c)]. Based on the information currently available to us, we find that Mid-City Plating failed to comply with the following conditions for a hazardous waste storage permit exemption, and violated the following requirements:

1. A person who generates a solid waste, as defined in 329 IAC § 3.1-7-1 [40 CFR § 261.2], must determine if that waste is a hazardous waste by using specific methods. *See*, 329 IAC § 3.1-7-1 [40 CFR § 262.11].

At the time of the inspection, Mid-City Plating was storing material in several open containers, in containment pits, and on the floors throughout the facility, and could not

identify the hazards or contents of the materials. The locations and types of containers were: 1) one open 5-gallon bucket located on a trench near the E-coat line, containing an un-identified liquid; 2) four open 5-gallon buckets located on the floor near the E-coat line, containing an un-identified liquid; 3) one open 5-gallon bucket located on a pallet near the raw material storage area, containing an un-identified liquid; 4) a grated pit located near the WWTU waste water storage totes, containing a 4-inch thick un-identified solid material; 5) one orange plastic pallet located near the WWTU waste water storage totes, containing an un-identified liquid; 6) one plastic bath located near the former Barrel Row line plating process, containing an un-identified liquid; 7) a containment pit located below the zinc plating line and on the floor, containing a solid material; and 8) the floor throughout the facility, containing unidentified liquids.

2. A generator of hazardous waste must retain on-site a copy of all notices, certifications, waste analysis data, and other documentation produced pursuant to Land Disposal Restrictions. *See*, 329 IAC § 3.1-12-1 [40 CFR § 268.7(a)(8)].

At the time of the inspection, Mid City Plating did not have, as a record on-site, a land disposal restriction (LDR) notification form for the shipments of hazardous waste, carrying the hazardous waste code of F008, to Michigan Disposal.

3. A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. A small quantity handler of universal waste must immediately clean up and place in a container any lamp that is broken and must place in a container any lamp that shows evidence of breakage, leakage or damage that could cause the release of mercury or other hazardous constituents to the environment. In addition, each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)." *See*, 329 IAC § 3.1-16-2 [40 CFR § 273.13(d)(1) and (d)(2), and 40 CFR § 273.14(e)].

At the time of the inspection, Mid-City Plating was storing broken and crushed fluorescent light bulbs on the floor of the facility, next to the former Barrel Row Plating Line, with no documentation demonstrating the length of time that the light bulbs were located on the floor.

4. A generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that the waste is placed in containers, and the container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. *See*, 329 IAC §§ 3.1-7-1; 3.1-10-1 [40 C.F.R. § 262.34(a)(1)(i); 40 C.F.R. § 265.173(a)].

At the time of the inspection, Mid-City Plating failed to keep one 20-cubic yard roll-off container of F006 hazardous waste, located outside in the hazardous waste storage area, closed during storage, at a time when waste was not being added to or removed from the container.

5. A generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without obtaining a hazardous waste storage permit or achieving interim status, provided that the generator's waste is placed in tanks and the generator complies with the applicable requirements of Subpart J (tank systems) in 40 CFR Part 265. Owners or operators of new tank systems or components must ensure that the foundation, structural support, seams, connections, and pressure controls, if applicable, are adequately designed and that the tank system has sufficient structural strength, compatibility with the waste to be stored or treated, and corrosion protection so that it will not collapse, rupture or fail. The owner or operator must obtain a written assessment reviewed and certified by an independent, qualified, registered professional engineer, attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste. *See*, 329 IAC § 3.1-10-1 [40 CFR § 262.34(a)(ii); 40 CFR § 265.192(a)].

*"New tank system" or "new tank component"* is defined as a tank system or component that will be used for the storage or treatment of hazardous waste and for which installation has commenced after June 20, 1988. *See*, 329 IAC § 3.1-4-18 [40 CFR § 260.10].

At the time of the inspection, Mid-City Plating was storing hazardous waste on-site in a containment pit located under one of the zinc plating lines, which meets the definition of a *new tank system*. A written assessment, reviewed and certified by an independent, qualified, registered professional engineer, attesting that the system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste had not been performed.

6. A generator must meet all of the requirements of Subpart J (tank systems) in 40 CFR Part 265 if the waste is placed in tanks. *See*, 329 IAC §§ 3.1-10-1 and 3.1-10-2 [40 CFR §§ 262.34(a)(1)(ii); 265.193; 265.194; and 265.195].

At the time of the inspection, Mid-City Plating was storing hazardous waste on-site in a containment pit located under one of the zinc plating lines, which meets the definition of a *new tank system*. This new tank system did not have: 1) secondary containment; 2) appropriate controls and practices to prevent spills and overflows from the containment pit; or 3) daily documented inspections of the new tank system pursuant to 40 CFR § 265.195.

7. A generator of hazardous waste may accumulate hazardous waste on-site for 90 days or less without obtaining a hazardous waste storage permit or achieving interim status, provided that the generator's waste is placed in tanks and the generator complies with the applicable requirements of Subpart J (tank systems) in 40 CFR Part 265. All new tanks

and ancillary equipment must be tested for tightness prior to being covered, enclosed or placed in use. If a tank system is found not to be tight, all repairs necessary to remedy the leak(s) in the system must be performed prior to the tank system being covered, enclosed or placed in use. *See*, 329 IAC §§ 3.1-10-1 and 3.1-10-2 [40 CFR §§ 262.34(a)(1)(ii) and 265.192(d)].

At the time of the inspection, Mid-City Plating was storing hazardous waste in a containment pit located underneath one of the zinc plating lines. Mid-City Plating had not performed tightness testing of this tank system or ancillary equipment.

8. A generator of hazardous waste must inspect, where present, at least once each operating day, the overspill/spill control equipment, the above ground portions of the tank system, data gathered from monitoring equipment and leak-detection equipment, and the construction materials and the area immediately surrounding the externally accessible portion of the tank system. The generator must document all inspections of the above items in the operating record of the facility. *See*, 329 IAC §§ 3.1-10-1 and 3.1-10-2 [40 CFR §§ 262.34(a)(1)(ii) and 265.195].

At the time of the inspection, Mid-City Plating did not have complete documentation available on-site showing that the hazardous waste storage tank system, including ancillary equipment, was inspected once per operating day.

9. A generator of hazardous waste must ensure that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container of hazardous waste, and while being accumulated on-site, each container of hazardous waste must be labeled or marked clearly with the words, "Hazardous Waste." *See*, 329 IAC §§ 3.1-7-1 and 3.1-10-1 [40 CFR § 262.34(a)(2) and (a)(3)].

At the time of the inspection, Mid-City Plating was storing an approximately one cubic yard container of F006 hazardous waste underneath the waste water treatment unit (WWTU) filter press, without an accumulation date and without the words, "Hazardous Waste," marked on the container.

At the time of the inspection, Mid-City Plating was storing one 20-cubic yard roll-off container of F006 hazardous waste outside in the hazardous waste storage area, without an accumulation date and without the words, "Hazardous Waste," marked on the container.

At the time of the inspection, Mid-City Plating was storing hazardous waste in a containment pit located under one of the zinc plating lines, which meets the definition of a *new tank system*, without an accumulation date and without the words, "Hazardous Waste," marked on the tank.

10. Facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. *See*, 329 IAC §§ 3.1-7-1 and 3.1-10-1 [40 CFR §§ 262.34(a)(4) and 265.31].

At the time of the inspection, liquids from the plating operations, that had not either entered the WWTU yet, or had been placed into containers or tanks, were located on the floor throughout the facility. Mid-City Plating did not have a procedure in place to clean spills and did not have a procedure to either put liquids back into the plating operations or put them into the WWTU.

11. A generator of hazardous waste may accumulate as much as 55 gallons of hazardous waste or one quart of acutely hazardous waste in containers at or near the point of generation which is under the control of an operator of the process generating the waste, provided that the container holding hazardous waste must be marked with either the words, "Hazardous Waste," or with other words that identify the contents of the containers. *See*, 329 IAC §§ 3.1-7-1 and 3.1-9-1 [40 CFR § 262.34(c)(1)(ii)].

At the time of the inspection of the satellite accumulation area, one 55-gallon container of F008 hazardous waste was not located at or near the point of generation which is under the control of an operator of the process generating the waste and the container was not marked with either the words, "Hazardous Waste," or with other words that identify the contents of the containers.

12. A generator of hazardous waste must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. *See*, 329 IAC §§ 3.1-7-1 and 3.1-10-1 [40 CFR §§ 262.34(a)(1) and 265.174].

At the time of the inspection, weekly inspections of the hazardous waste storage area were not being conducted.

13. A generator of hazardous waste must successfully complete a program of classroom instruction or on-the-job training of facility personnel that teaches them to perform their duties in a way that ensures the facility's compliance. *See*, 329 IAC §§ 3.1-7-1 and 3.1-10-1 [40 CFR §§ 262.34(a)(4) and 265.16(a)(3), (b), (c), (d) and (e)].

At the time of the inspection, Mid-City Plating's training program: 1) did not include documentation that facility personnel successfully completed the program required within six months after the effective date of their employment or assignment to a facility, or to a new position at a facility, whichever is later; 2) did not include documentation that facility personnel took part in an annual review of the initial training required since 2003; 3) did not include job titles, job descriptions or a written description of the type and amount of both initial training and continuing training that will be given to each person

filling a position dealing with hazardous waste management; 4) did not document that the training or job experience required had been given to, and completed by, facility personnel; and 5) did not maintain training records of former employees for at least three years from the last date of employment.

14. A generator of 1,000 kilograms or greater of hazardous waste in a calendar month, who accumulates hazardous waste for more than 90 days, is an operator of a storage facility and is required to obtain an Indiana hazardous waste storage permit. *See*, 329 IAC § 3.1-7-1 [40 CFR § 262.34(b)].

At the time of the inspection, Mid-City Plating was storing approximately 20 cubic yards of F006 hazardous waste, located outside in the hazardous waste storage area, for greater than 90 days, and had not applied for or obtained an Indiana hazardous waste storage permit.

15. A large quantity generator that accumulates hazardous waste on-site and does not meet the conditions for a permit exemption of 329 IAC § 3.1-7-1 and 40 CFR § 262.34 is an operator of a hazardous waste storage facility, and is required to obtain an Indiana hazardous waste storage permit. *See*, 329 IAC § 3.1-7-1 [40 CFR § 262.34(a)].

Upon failing to meet the conditions identified in item numbers 4 through 15 listed above, Mid-City Plating became an operator of a hazardous waste storage facility. Mid-City Plating has not applied for or received a hazardous waste storage permit nor does Mid-City Plating have interim status. Mid-City Plating's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 329 IAC §§ 3.1-13-1; 3.1-13-2(1), (2), (3) and (4); and 3.1-13-3 through 3.1-13-17 [40 CFR §§ 270.1(c) and 270.13].

At this time, EPA is not requiring Mid-City Plating to apply for an Indiana hazardous waste storage permit, provided that Mid-City Plating immediately complies with the conditions for an exemption set forth in the regulations identified above.

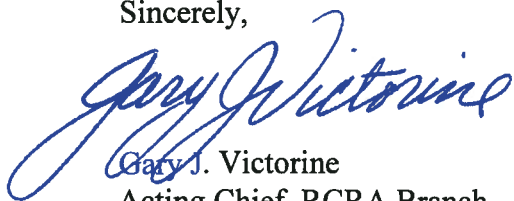
Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violations and requiring compliance immediately or within a specified time period.

Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above requirements.

You should submit your response to Jamie L. Paulin, U.S. Environmental Protection Agency, Region 5 (LR-8J), 77 West Jackson Boulevard, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Paulin, of my staff, at (312) 886-1771.

Sincerely,



Gary J. Victorine  
Acting Chief, RCRA Branch  
Land and Chemicals Division

Enclosures

cc: Nancy Johnston, Indiana Department of Environmental Management



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSTALLATION NAME:** Mid City Plating Company

**EPA ID No.:** IND 006 049 456

**LOCATION ADDRESS:** 912 East Charles Street  
Muncie, Indiana 47305

**NAICS CODE(S):** 332813 [Electroplating, Plating, Polishing, Anodizing, and Coloring]

**DATE OF INSPECTION:** June 22, 2010

**EPA INSPECTOR:** Jamie L. Paulin  
Chemist  
LR-8J  
Compliance Section 1  
(312) 886-1771 Direct  
(312) 353-4788 Facsimile  
paulin.jamie@epa.gov

**PREPARED BY:** Jamie L. Paulin  
Jamie L. Paulin  
Chemist  
11/24/10  
Date

**REVIEWED BY:** Lorna M. Jereza  
Lorna M. Jereza, Chief  
Compliance Section 1  
RCRA Branch  
11/24/10  
Date



## INTRODUCTION:

The purpose of the inspection was to conduct an un-announced Compliance Evaluation Inspection (CEI) at Mid City Plating Company (Mid City Plating), located at 912 East Charles Street, Muncie, Indiana 47305, to examine Mid City Plating's management of its Resource Conservation and Recovery Act (RCRA) regulated waste, by the U.S. Environmental Protection Agency.

Mid City Plating notified as a large quantity generator on or about March 1, 1990 and remained in large quantity generator status until 2008, when they re-notified as a small quantity generator. Then in 2010, they reported on the March 2, 2010, biennial report, as a conditionally exempt small quantity generator.

Mid City Plating also has an NAICS code of 332813 [Electroplating, Plating, Polishing, Anodizing, and Coloring], and is mainly operating two out of four plating lines; zinc electroplating on steel. Cyanide is also still being used within the plating operations.

Mid City Plating stores hazardous wastes on-site in a roll-off container, containers, and storage tanks. The waste waters collected from the plating lines are treated on-site in the waste water treatment (WWT) unit system. A hazardous waste filter cake, F006, is collected after WWT and stored in a container underneath the filter press. The F006 filter cake is then transferred into a roll-off container, approximately 20-yards, that is stored outside. A hazardous waste, carrying the waste code of F008, is collected into 55-gallon containers, from cleaning out the plating baths where cyanide is still used in the process.

Mid City Plating operates with one shift and employs approximately 5 employees.

Mid City Plating has never been inspected by EPA; however the Indiana Department of Environmental Management (IDEM) has inspected them seven times since 1992.

## OPENING CONFERENCE:

I arrived at Mid City Plating at or around 9:50 am on June 22, 2010. Ms. Lisa Frost, Environmental Manager Industrial Waste, from IDEM, Office of Land Quality, joined me and we entered the building together. No receptionist was located at the front desk. Mr. Marc Muzzarelli, Production Manager, greeted us and we convened in a conference room for the opening conference.

During the opening conference, I presented my credentials to all personnel in attendance and explained that I would like to perform the physical inspection first and then conduct the records review.

The personnel that were in attendance at the opening conference are listed in *Table 1*.

**Table 1. Personnel in Attendance during CEI at Mid City Plating Systems, Inc.**

Personnel	Title	Department
Marc Muzzarelli	Production Manager	Mid City Plating
Rodney Muzzarelli	Owner	Mid City Plating
Lisa Frost	Environmental Manager	IDEM
Jamie Paulin	Chemist	EPA RCRA Branch

Mr. Muzzarelli explained to us that business had decreased significantly over the last few years from 3.5 million dollars per year to 500,000 dollars per year. He further explained that the number of Mid City Plating employees had decreased from 55 employees to 5 employees. Only one shift was in operation at the time of the inspection.

According to Mr. Muzzarelli, the only type of operation that was occurring was zinc electroplating on steel. He stated that Mid City Plating had four plating lines; however they were only operating two of the four lines. He also explained that the WWT system was only being operated every two months.

I inquired about the trailers parked outside the facility, on the East side. Mr. Muzzarelli explained that Mid City Plating used to be involved in the trucking of their products. However, they have since discontinued trucking the products and therefore, the trailers are parked at the facility and not in-use.

We began the physical inspection near the Hanson Plating line, located inside and on the East side of the facility.

#### **SITE INSPECTION:**

Mr. Muzzarelli escorted us on the physical inspection, which began near the Hanson Plating line, located inside and on the East side of the facility.

Mr. Muzzarelli explained that the line had not been in operation since January 2010. However, there was a liquid being stored within a trench, located in the floor near the Hanson Plating line. Mr. Muzzarelli stated that muriatic acid and hydrochloric acid are used within this process. The acid waste collects into the trench and then is pumped into the WWT unit every three months for

treatment, according to Mr. Muzzarelli. He further stated that, in addition, the “working solutions” from the process were also being stored in totes to be used in the process, if the process operates again. *See, photographs 1, 2 and 3.*

The E-Coat Line was located on the East side of the Hanson Plating Line. Mr. Muzzarelli stated that the E-Coat Line was only operated 1 or 2 shifts per month. A 5-gallon bucket of liquid was positioned on a trench/sump pit with a grate. The bucket was open and did not contain any type of labeling. Mr. Muzzarelli explained that the bucket was storing a “cleaner” and it was going to be added back into the E-Coat Line tank when the line would be operated again. He further explained that the trench/sump pit collects waste water from the E-Coat operation that is eventually pumped into the WWT unit. *See, photographs 4 through 7.*

On the floor, near the E-Coat Line, were three 5-gallon open buckets containing an un-identified liquid. The buckets were not labeled. Mr. Muzzarelli stated that the buckets probably contained paint; however spider webs/cob webs were located inside of the buckets showing that they had been there for some time. *See, photographs 8 and 9.*

Puddles of liquid were located on the floor near the E-Coat Line and another open, un-labeled, 5-gallon bucket containing an un-identified liquid was also located in this area. *See, photograph 10.*

As we proceeded west through the facility, shelving units were positioned along the walls. The shelving units contained many 55-gallon containers. Mr. Muzzarelli described the containers as either empty, storing raw materials, or storing oil. *See, photographs 11 through 14 and 21.*

In this area, an open, un-labeled, 5-gallon bucket was being stored on a pallet. The bucket contained an un-identified material. Also, being stored on the pallet, was a corroded metal lid to a 55-gallon container. *See, photograph 15.*

At least three totes were being stored in this area, as well. The totes were filled with a liquid material. Mr. Muzzarelli stated that he stores various plating line waste waters, prior to treatment in the WWT unit, inside of these totes. The totes were not labeled with any wording and were not dated. *See, photograph 19.*

A pit, with a grate, was located near these totes. A 4-inch thick solidified and un-identified material was located inside of the pit. Mr. Muzzarelli explained that the pit was designed to capture spilled waste water. *See, photographs 16 through 20.*

A plastic pallet was also positioned in this area. Nothing was being stored on the pallet; however an un-identified liquid was located inside of the pallet. *See, photographs 22 and 23.*

Along the South wall of this area of the facility, were several stacked 55-gallon containers. Totes were also being stored along this wall in a 3-tiered fashion. The totes definitely contained a liquid, which Mr. Muzzarelli identified as “working solutions.” He further stated that he used his

own color-coded labeling system to identify specific “working solutions,” that could be used in the plating processes. However, no words, identifying the contents, were located on the totes. *See, photographs 24 through 26.*

As we continued the inspection, a gray tank was located within the facility and was attached to an above-ground piping system. Mr. Muzzarelli expressed that the tank is used to heat city water to be used in the E-Coat Plating Process. Also being stored in this area, was a 10,000 gallon blue tank. Mr. Muzzarelli explained that this tank was empty and was to be used as a “crash” tank for the E-Coat Line material(s) in case of an emergency. *See, photographs 27 and 28.*

We continued the inspection, outside, on the East side of the facility. An open storm water reservoir was located in this area. The grid covering was not safely placed on the reservoir. *See, photograph 29.*

Four trailers were parked in this outside area. Mr. Muzzarelli had previously explained that Mid City Plating used to be involved in the trucking business of shipping the finished products to their customers. However, they no longer are in the trucking business so the four trailers were parked in this outside area. Trailers 1 and 2 were empty (from East to West). Trailer 3 was being used for the Barrel Row Line plating equipment that had been dismantled. Trailer 4 was being used for storage of fans, light fixtures, pallets and other pieces of equipment. One of the trailers did have Mid City Plating’s name and logo located on the outside of the trailer. *See, photographs 30 through 34.*

As we entered the facility on the East side, a spill kit was being stored inside. No hazardous waste was being stored in this area. I opened the spill kit container and the container was being used as a garbage can. *See, photograph 35.*

We then proceeded West through the inside of the facility. We entered a room where the Barrel Row Plating Line had once been in operation. According to Mr. Muzzarelli, this Barrel line had been discontinued and was in the process of being dismantled. Used oil was being stored inside of a pit that once was used in this Barrel Row Plating Line operation. Equipment was still being stored in this area. Liquids, material(s) and staining were located on the floor. An un-identified liquid was being contained inside of a white tank, and inside of a 5-gallon bucket that were also being stored in this area. Mr. Muzzarelli seemed to think that this liquid was hydraulic oil. *See, photographs 36, 37 and 39 through 41, 45, 46, 48, 49 and 50.*

A Strip Line was still in operation, across the aisle from where the Barrel Row Plating line was once in operation. Debris and equipment were being stored inside of the containment pit of the Strip Line. *See, photograph 38.*

An empty tank, that was once used in the Barrel Row Line operation, was also located in this area. No liquid was located inside of the tank; however a blue/white/yellow residue was still located inside of the tank. Mr. Muzzarelli explained that the tank would be dismantled. *See, photograph 42.*

A broken fluorescent light bulb was also located on the floor of this area. Zinc metal, obtained from the plating line, was being stored on a piece of fabric on the floor in this area, as well, near the broken fluorescent light bulb. *See, photographs 43 and 44.*

Additionally, within this area, an open 55-gallon container was being stored. The container was approximately  $\frac{1}{4}$  full with a liquid, which Mr. Muzzarelli described as RIT dye that is used in the plating dye operation. *See, photograph 47.*

I then inspected the WWT system. [The WWT system adjusts pH first and then chemically destructs each stream, creating a metal-hydroxide sludge. Once the sludge is filter pressed, the F006 hazardous waste stream is generated.] Mr. Muzzarelli also expressed that the discharge from the WWT system is released into the sewer system and that Mid City Plating does have a discharge permit via the Muncie Sanitary District, Bureau of Water Quality. *See, photograph 58.*

The filter press of the WWT system did discharge the F006 WWT sludge into a container, with a volume of approximately 110 gallons. Mr. Muzzarelli stated that he dumps the F006 into the roll-off storage container every month to 3 months. The F006 collection container was not labeled with the words, "Hazardous Waste," nor was it labeled with a date of accumulation. The container also did not contain a lid and was being stored in an opened position. *See, photographs 51 through 53.*

A 300 gallon sump pit was located underneath the WWT system, which collects the waste water solutions from the plating baths. A trench was also connected to the sump pit. Mr. Muzzarelli confirmed that he was only running the WWT system twice every 3 months, therefore the hazardous waste water solutions were being stored within the sump pit and trench prior to treatment. Green liquid was seeping out of the ground sump pit/trench and located on the floor. Liquid and debris were located in between the treatment baths. In addition, it appeared that a blue liquid had leaked out of a tank, labeled "Sulfuric Acid." *See, photographs 54 through 57.*

We continued west inside of the facility where I inspected the zinc plating line. Mr. Muzzarelli explained that the process causes a continual spill of alkaline cleaner onto the floor. He then places kitty litter on top of the spilled material onto the floor on a continual basis and never cleans the spilled material and kitty litter combination, according to Mr. Muzzarelli. Material from the plating operation was also being collected in the containment pit, located underneath the plating line. Material from the plating operation was also located on the floor. Corrosion was evident on the surface of the floor. *See, photographs 59 through 64.*

A vertical, rectangular tank on wheels was also being stored near the zinc plating line. Mr. Muzzarelli described this tank as storing "chromate working solution," to be re-used in the plating line. *See, photograph 65.*

I then inspected the laboratory area, where Mid City Plating conducts testing on its products or conducts testing to see if it can plate a certain product. A bath was full of a liquid within this area, and was described, by Mr. Muzzarelli, as containing laboratory water. *See, photograph 66.*

We then proceeded to the South/West corner of the facility. Another zinc plating line was in operation in this area. A trench was located on the floor in between this room and the WWT system room. Red un-identified liquid was being stored within the trench. Pipes were located inside of the trench and were not connected from the exposed ends. *See, photographs 67 and 69.*

Liquid was located on the floor near this plating line. Various equipment and raw materials were also being stored near this line. *See, photographs 68, 70 and 71.*

A gray tank was being stored within this area. Mr. Muzzarelli described this tank as a storage tank for "working solutions." *See, photograph 72.*

A containment pit was located underneath this zinc plating line. Liquids were being stored inside of the containment pit and on the floor. Kitty litter was being thrown on the liquid material, according to Mr. Muzzarelli. *See, photographs 73 and 74.*

Liquids were located on the floor in the South/West corner of the room. Un-identified material and equipment were also located on the floor of this corner. *See, photographs 75 and 76.*

On the North/West corner of the room, red liquid was located inside of the containment pit of the plating line. Material was also being accumulated and stored on the floor near the line. A water tank was located in this area that was used in pumping water into plating baths where required. *See, photographs 77 through 80.*

I then inspected the hazardous waste storage area. No containers were being stored on the pallet specific to the storage area. However, one 55-gallon container was being stored near this storage area. The container was closed; however not labeled or dated. Mr. Muzzarelli explained that this container was a satellite accumulation area container storing F008 hazardous waste. The container was not located at or near the point of generation. *See, photographs 81 through 84.*

We exited the building on the North/West side of the facility. A roll-off container was located outside. The roll-off was filled to the top, inside of the container, with F006 hazardous waste. The lid was not completely closed and was not capable of physically closing completely due to the design of the container and lid. The container was not labeled with the words, "Hazardous Waste," or with a date of accumulation. Mr. Muzzarelli explained that he was having Enviroline manifest the container off-site, as hazardous waste, for disposal approximately one time per year. The volume of the container was approximately 20 cubic yards. In addition, F006 hazardous waste was located on the container and on the ground. *See, photographs 85 through 90.*

We continued the inspection in the maintenance room, located on the West side of the facility. A trench/pit with a grate was located inside of this room. Liquid was being stored within the trench/pit. Mr. Muzzarelli stated that a cleaner collects inside of this trench/pit and is periodically pumped to the WWT system. *See, photographs 91 through 93.*

Once the site inspection was completed, we continued the records review inspection in the conference room located in the office area.

Mr. Muzzarelli aided us during the records review.

## RECORDS REVIEW:

Mr. Muzzarelli aided us in the review of the hazardous waste records after we completed the physical site inspection.

The records that I inspected were records required under Indiana Administrative Code (IAC) 329 IAC § 3.1-7-1 [40 CFR § 262] for large quantity generators, which included hazardous waste determination information, waste analyses, manifests, emergency procedures and training records.

### 1. Manifests

I reviewed the manifests of the hazardous waste shipments from 2006 to the time of the inspection. The list of manifests shipped since 2006 are located in Table 2. below. *No manifests were available after 2007.*

Mr. Muzzarelli explained that he is only shipping the F006 roll-off, quantity of shipment 20 – 25 yards, approximately once per year. It is not clear when the last shipment of the F006 occurred. It appears that a shipment has not occurred since 2007.

**Table 2. List of Manifests on File during CEI at Mid City Plating Systems, Inc.**

Manifest Number	TSDf	Date	Hazardous Waste Code	Volume Shipped
MI 9369686	Michigan Disposal	12/29/2006	F008	7 x 55-gallon containers
IL 11434566	Envirite	2/9/2006	F006	25 yards
	Michigan Disposal	2/27/2006	F008	7 x 55-gallon containers

Manifest Number	TSDF	Date	Hazardous Waste Code	Volume Shipped
	Michigan Disposal	3/3/2006	F008	7 x 55-gallon containers
IL 11434568	Envirite	4/13/2006	F006	25 yards
IL 11088964	Envirite	6/20/2006	F006	25 yards
IL 11091075	Envirite	9/1/2006	F006	20 yards
IL 000113601	Envirite	11/27/2006	F006 and D007	25 yards
IL 000113602	Envirite	7/26/2007	F006	25 yards

## 2. Waste Analysis and Recordkeeping

I observed that Mid City Plating did not have, as a record on-site, a land disposal restriction (LDR) notification form for the shipments of hazardous waste, F008, to Michigan Disposal.

## 3. Personnel Training

At the time of the inspection, according to Mr. Muzzarelli, RCRA training had not been conducted since April 12, 2003. Delta Chemicals and Equipment, Inc. performed the training in 2003. Therefore, Mid City Plating was not training the employees who handle hazardous waste on an annual basis. Mid City Plating was operating as a large quantity generator at the time of the inspection.

In addition, Mid City Plating did not have a complete written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management.

Lastly, the following training documents were not available at the time of the inspection: 1) job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job; and 2) a written job description for each position related to hazardous waste management, including the requisite skill, education or other qualifications and duties of personnel assigned to each position.

To note, Jerry Rollins signed a manifest in 2007 and he was not listed on any document showing that he had received RCRA training within six months of filling his position dealing with



hazardous waste management or that he had received an annual refresher of the initial training.

#### **4. Contingency Plan**

A Contingency Plan was available for my review during the inspection. I did not observe any deficiencies with the plan at the time of the inspection.

#### **5. Preparedness and Prevention**

Based on my review of Mid City Plating's records, Mid City Plating appeared to have made agreements with local emergency authorities, contractors and had made arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility.

#### **6. Biennial Reporting**

Based on my review of the records, Mid City Plating had filed a biennial report with the Indiana Department of Environmental Management, by March 1 for the reporting years of 2009, 2007, and 2005. They reported as a large quantity generator for the reporting year of 2005, as a small quantity generator for the reporting year of 2007 and as a conditionally exempt small quantity generator for the reporting year of 2009.

#### **7. Weekly and Daily Inspections**

I observed at the time of the inspection that Mid City Plating was not documenting weekly inspections of the hazardous waste storage container areas and was not documenting the daily inspections of hazardous waste tanks and the tank systems.

#### **8. Tank Systems**

The sump pits, trenches and containment pits do meet the definition of a tank. Written statements, including certification statements of the design and installation requirements, were not located at Mid City Plating at the time of the inspection.

The sump pumps, pits and trenches did not have secondary containment. Ancillary equipment/piping was located both aboveground and below-ground; however no daily inspections were documented as being performed.

I did not notice any spill prevention controls or overfill prevention controls other than visual inspection, which was not documented as being performed.

A written daily inspection log was not available. Additionally, no tank assessments, or observable leak detection systems, were available at the time of the inspection.

## **CLOSING CONFERENCE:**

*I conducted the closing conference with Mr. Muzzarelli and Ms. Frost, and provided Mr. Muzzarelli with the following recommendations:*

- a. To ensure proper labeling of containers.
- b. To keep containers of hazardous waste closed – especially the roll-off container of F006 hazardous waste. The lid of the F006 roll-off container did not close.
- c. To ensure RCRA training was to be conducted annually since they were still operating as a large quantity generator and meet all of RCRA training requirements.
- d. To make waste determinations on all of the liquids being stored in buckets, pits, trenches, containers and then dispose of the material(s) properly.
- e. Make waste determinations on all spills, liquids, and kitty litter combinations on floor and dispose of the material(s) properly.
- f. To ensure that hazardous waste is shipped within 90 days.

During the closing conference, Mr. Muzzarelli explained that G and G Oil was taking Mid City Plating's used oil for disposal and that Lighting Resources was taking their fluorescent light bulbs for recycling.

I departed Mid City Plating around 2:30pm.

## **ATTACHMENT: (1)**

Attachment 1              Photographs taken during the time of the inspection.

## **ENCLOSURE: (1)**

# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 1  
**Photo Filename** P6220094.JPG  
**Date/Time** 6/22/2010  
9:14:06 AM  
**Photographer** Jamie Paulin

## Description

Hanson Plating Machine trench. Waste water from plating line was collected in trench and was manually pumped into WWT unit. Line had not been in operation since January 2010.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 2  
*Photo Filename* P6220095.JPG  
*Date/Time* 6/22/2010  
9:14:18 AM  
*Photographer* Jamie Paulin

## *Description*

Hanson Plating Machine trench. Waste water from plating line was collected in trench and was manually pumped into WWT unit. Line had not been in operation since January 2010. Liquid was located inside of trench at time of inspection.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 3  
*Photo Filename* P6220096.JPG  
*Date/Time* 6/22/2010  
9:16:20 AM  
*Photographer* Jamie Paulin

## *Description*

Hanson Plating Machine. Materials were being stored inside of totes located near plating line. Plating line had not been used since January 2010.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 4  
*Photo Filename* P6220097.JPG  
*Date/Time* 6/22/2010  
9:19:46 AM  
*Photographer* Jamie Paulin

## *Description*

Open bucket of material located on trench near the E-coat line. E-coat line was in operation 1 or 2 shifts per month.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 5  
*Photo Filename* P6220098.JPG  
*Date/Time* 6/22/2010  
9:21:08 AM  
*Photographer* Jamie Paulin

## *Description*

Trench located near E-coat line. Trench collected waste water to be pumped into WWT unit periodically.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 6  
*Photo Filename* P6220099.JPG  
*Date/Time* 6/22/2010  
9:21:18 AM  
*Photographer* Jamie Paulin

## *Description*

Open bucket of material located on trench near the E-coat line. E-coat line was in operation 1 or 2 shifts per month.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 7  
*Photo Filename* P6220100.JPG  
*Date/Time* 6/22/2010  
9:27:12 AM  
*Photographer* Jamie Paulin

## *Description*

E-coat line.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 8  
*Photo Filename* P6220101.JPG  
*Date/Time* 6/22/2010  
9:27:26 AM  
*Photographer* Jamie Paulin

## *Description*

3 open buckets of un-identified material were being stored on the floor near E-coat line. Spider webs/cob webs were located inside of buckets.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 9  
*Photo Filename* P6220102.JPG  
*Date/Time* 6/22/2010  
9:27:34 AM  
*Photographer* Jamie Paulin

## *Description*

3 open buckets of un-identified material were being stored on the floor near E-coat line. Spider webs/cob webs were located inside of buckets.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 10  
*Photo Filename* P6220103.JPG  
*Date/Time* 6/22/2010  
9:32:20 AM  
*Photographer* Jamie Paulin

## *Description*

Liquid was located on the floor near plating line. Open bucket of material was also located in this area.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 11  
*Photo Filename* P6220104.JPG  
*Date/Time* 6/22/2010  
9:34:42 AM  
*Photographer* Jamie Paulin

## *Description*

55-gallon containers were being stored on a 5-tiered shelving unit. The 55-gallon containers were described as empty.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 12  
*Photo Filename* P6220105.JPG  
*Date/Time* 6/22/2010  
9:34:52 AM  
*Photographer* Jamie Paulin

## *Description*

55-gallon containers and other types of containers were being stored on a 3-tiered shelving unit. The containers were described as storing raw materials.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 13  
*Photo Filename* P6220106.JPG  
*Date/Time* 6/22/2010  
9:35:04 AM  
*Photographer* Jamie Paulin

## *Description*

3-tiered shelving unit. 55-gallon containers were being stored on the shelves. The containers were described as storing oil.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 14  
*Photo Filename* P6220107.JPG  
*Date/Time* 6/22/2010  
9:35:58 AM  
*Photographer* Jamie Paulin

*Description*

Raw material storage.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 15  
*Photo Filename* P6220108.JPG  
*Date/Time* 6/22/2010  
9:37:26 AM  
*Photographer* Jamie Paulin

## *Description*

An open bucket, containing a material, was being stored in the raw material area on a pallet. A corroded metal lid was also being stored on the pallet.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 16  
*Photo Filename* P6220109.JPG  
*Date/Time* 6/22/2010  
9:39:14 AM  
*Photographer* Jamie Paulin

## *Description*

A pit, with a grate, was located near the WWT unit waste water storage totes. A 4-inch thick un-identified solid material was located in the bottom of the pit.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 17  
*Photo Filename* P6220110.JPG  
*Date/Time* 6/22/2010  
9:39:36 AM  
*Photographer* Jamie Paulin

## *Description*

A pit, with a grate, was located near the WWT unit waste water storage totes. A 4-inch thick un-identified solid material was located in the bottom of the pit.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 18  
*Photo Filename* P6220111.JPG  
*Date/Time* 6/22/2010  
9:39:44 AM  
*Photographer* Jamie Paulin

## *Description*

A pit, with a grate, was located near the WWT unit waste water storage totes. A 4-inch thick un-identified solid material was located in the bottom of the pit.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 19  
*Photo Filename* P6220112.JPG  
*Date/Time* 6/22/2010  
9:40:06 AM  
*Photographer* Jamie Paulin

## *Description*

Totes that contained various plating line waste water prior to be treated in the WWT unit were being stored near the collection pit. The totes were not labeled or dated.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 20  
*Photo Filename* P6220113.JPG  
*Date/Time* 6/22/2010  
9:43:04 AM  
*Photographer* Jamie Paulin

## *Description*

A pit, with a grate, was located near the WWT unit waste water storage totes. A 4-inch thick un-identified solid material was located in the bottom of the pit.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 21  
*Photo Filename* P6220114.JPG  
*Date/Time* 6/22/2010  
9:46:48 AM  
*Photographer* Jamie Paulin

## *Description*

3-tiered shelving unit storing 55-gallon containers. Containers were described as empty.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 22  
*Photo Filename* P6220115.JPG  
*Date/Time* 6/22/2010  
9:48:36 AM  
*Photographer* Jamie Paulin

## *Description*

A plastic pallet was being stored near the WWT unit waste water storage totes. An unidentified liquid was located inside of the pallet.





# Photographs for Mid City Plating Company CEI 6/22/2010

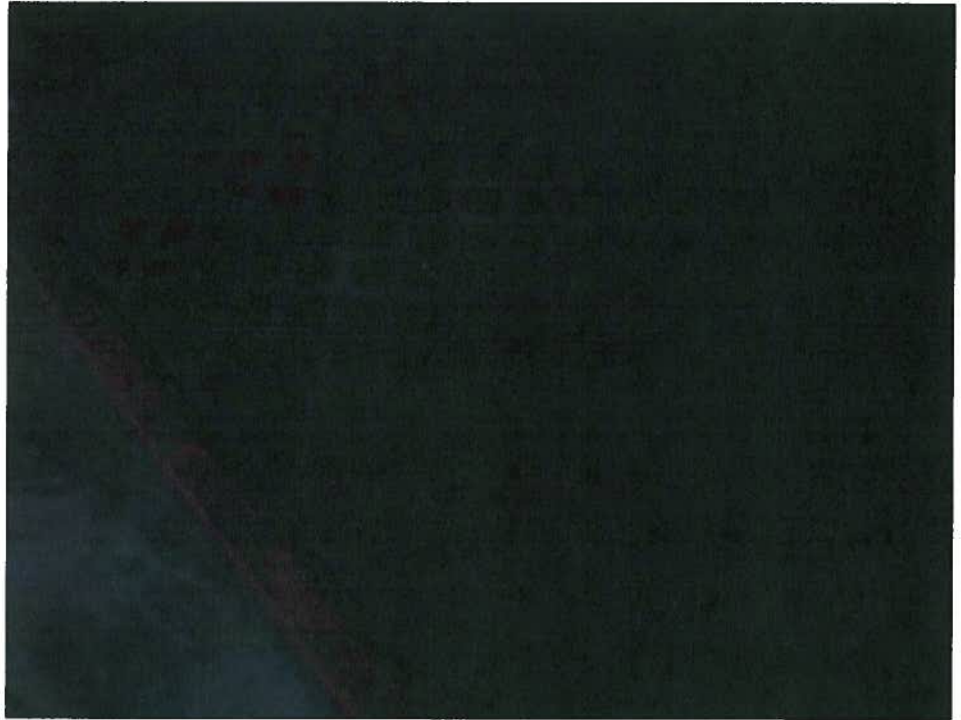
Media: RCRA

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*Disk Number* 1  
*Photo Number* 23  
*Photo Filename* P6220116.JPG  
*Date/Time* 6/22/2010  
9:48:48 AM  
*Photographer* Jamie Paulin

## *Description*

A plastic pallet was being stored near the WWT unit waste water storage totes. An unidentified liquid was located inside of the pallet.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 24  
**Photo Filename** P6220117.JPG  
**Date/Time** 6/22/2010  
9:48:58 AM  
**Photographer** Jamie Paulin

## Description

55-gallon containers were beings stored along the South wall. The containers were described as either empty or containing "working solutions."



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 25  
*Photo Filename* P6220118.JPG  
*Date/Time* 6/22/2010  
9:50:38 AM  
*Photographer* Jamie Paulin

## *Description*

Totes were being stored and stacked along South wall. The totes were storing "working solutions."



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 26  
*Photo Filename* P6220119.JPG  
*Date/Time* 6/22/2010  
9:52:58 AM  
*Photographer* Jamie Paulin

## *Description*

55-gallon containers were being stacked and stored next to the totes, along the South wall. The containers were described as being empty.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 27  
**Photo Filename** P6220120.JPG  
**Date/Time** 6/22/2010  
9:56:10 AM  
**Photographer** Jamie Paulin

## Description

City water storage tank. Water to be used in E-coat system.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 28  
*Photo Filename* P6220121.JPG  
*Date/Time* 6/22/2010  
9:56:24 AM  
*Photographer* Jamie Paulin

## *Description*

10,000 gallon E-coat line crash tank to be used in emergencies. The tank was described as empty; however will be used to collect E-coat line material(s) in cases of emergencies.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 29  
*Photo Filename* P6220122.JPG  
*Date/Time* 6/22/2010  
9:58:18 AM  
*Photographer* Jamie Paulin

## *Description*

A storm water reservoir was located outside on the East side of the facility. The grid covering was not safely placed on the reservoir.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 30  
*Photo Filename* P6220123.JPG  
*Date/Time* 6/22/2010  
9:59:12 AM  
*Photographer* Jamie Paulin

## *Description*

Four trailers were located outside on the East side of the facility. Trailer 1 was empty.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 31  
*Photo Filename* P6220124.JPG  
*Date/Time* 6/22/2010  
9:59:24 AM  
*Photographer* Jamie Paulin

## *Description*

Four trailers were located outside on the East side of the facility. Trailer 2 was empty.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 32  
*Photo Filename* P6220125.JPG  
*Date/Time* 6/22/2010  
9:59:34 AM  
*Photographer* Jamie Paulin

## *Description*

Four trailers were located outside on the East side of the facility. Trailer 3 was being used as storage and contained Barrel line equipment.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 33  
**Photo Filename** P6220126.JPG  
**Date/Time** 6/22/2010  
10:01:08 AM  
**Photographer** Jamie Paulin

## Description

Four trailers were located outside on the East side of the facility. Trailer 4 was being used as storage and contained fans and light fixtures.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 34  
*Photo Filename* P6220127.JPG  
*Date/Time* 6/22/2010  
10:04:52 AM  
*Photographer* Jamie Paulin

## *Description*

Mid-City Plating name and logo was located on one of the trailers being stored outside on the East side of the facility.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 35  
*Photo Filename* P6220128.JPG  
*Date/Time* 6/22/2010  
10:05:58 AM  
*Photographer* Jamie Paulin

## *Description*

The spill kit was being stored on the East side of the facility, not near hazardous waste storage. The spill kit container was being used as a garbage can at the time of the inspection.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 36  
*Photo Filename* P6220129.JPG  
*Date/Time* 6/22/2010  
10:08:42 AM  
*Photographer* Jamie Paulin

## *Description*

Used oil was being stored inside of a pit that was located in the barrel row plating line room.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 37  
**Photo Filename** P6220130.JPG  
**Date/Time** 6/22/2010  
10:08:52 AM  
**Photographer** Jamie Paulin

## **Description**

Used oil was being stored inside of a pit that was located in the barrel row plating line room.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 38  
*Photo Filename* P6220131.JPG  
*Date/Time* 6/22/2010  
10:11:46 AM  
*Photographer* Jamie Paulin

## *Description*

Barrel Row and Strip Line. Containment pit.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 39  
**Photo Filename** P6220132.JPG  
**Date/Time** 6/22/2010  
10:12:22 AM  
**Photographer** Jamie Paulin

## Description

Barrel Row Line had been removed. Liquid was located on the floor. Equipment was being stored within the area.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 40  
*Photo Filename* P6220133.JPG  
*Date/Time* 6/22/2010  
10:13:02 AM  
*Photographer* Jamie Paulin

## *Description*

Barrel Row Line had been removed. Liquid and other material were located on the floor. Equipment was being stored within the area.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 41  
**Photo Filename** P6220134.JPG  
**Date/Time** 6/22/2010  
10:13:10 AM  
**Photographer** Jamie Paulin

## Description

Barrel Row Line had been removed. Liquid and other material were located on the floor. Equipment was being stored within the area. Rectangular equipment was being used as an oil bin.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 42  
*Photo Filename* P6220135.JPG  
*Date/Time* 6/22/2010  
10:15:04 AM  
*Photographer* Jamie Paulin

## *Description*

Barrel Row line bath. No liquid was located inside; however dried blue/white material was still located inside of bath. (Barrel Row line had been discontinued and tank was going to be dismantled.)





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 43  
**Photo Filename** P6220136.JPG  
**Date/Time** 6/22/2010  
10:15:12 AM  
**Photographer** Jamie Paulin

## Description

Broken fluorescent light bulb was located on the floor in the Barrel Row line room.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 44  
*Photo Filename* P6220137.JPG  
*Date/Time* 6/22/2010  
10:15:56 AM  
*Photographer* Jamie Paulin

## *Description*

Zinc metal was being stored on a piece of fabric, located on the floor, near the Barrel Row line.



# Photographs for Mid City Plating Company CEI 6/22/2010

**Media: RCRA**

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**Disk Number** 1  
**Photo Number** 45  
**Photo Filename** P6220138.JPG  
**Date/Time** 6/22/2010  
10:17:50 AM  
**Photographer** Jamie Paulin

## **Description**

Barrel Row line equipment and pallet being stored.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 46  
**Photo Filename** P6220139.JPG  
**Date/Time** 6/22/2010  
10:18:06 AM  
**Photographer** Jamie Paulin

## Description

Barrel Row line location. Liquids were being stored on the floor. Equipment was being stored within the area.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 47  
*Photo Filename* P6220140.JPG  
*Date/Time* 6/22/2010  
10:18:24 AM  
*Photographer* Jamie Paulin

## *Description*

RIT dye being stored in an open 55-gallon container.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 48  
*Photo Filename* P6220141.JPG  
*Date/Time* 6/22/2010  
10:20:00 AM  
*Photographer* Jamie Paulin

## *Description*

Un-identified liquid was being stored in a bath that had been used in the Barrel Row line plating process.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 49  
*Photo Filename* P6220142.JPG  
*Date/Time* 6/22/2010  
10:20:10 AM  
*Photographer* Jamie Paulin

## *Description*

An oily liquid was being stored in an open 5-gallon bucket. The oil was described as hydraulic oil.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 50  
**Photo Filename** P6220143.JPG  
**Date/Time** 6/22/2010  
10:21:34 AM  
**Photographer** Jamie Paulin

## Description

View of floor where the Barrel Row line was once in operation. Liquids and material were being stored on the floor. Various equipment was also being stored within the area.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 51  
**Photo Filename** P6220144.JPG  
**Date/Time** 6/22/2010  
10:22:30 AM  
**Photographer** Jamie Paulin

## Description

WWT unit filter press. Approximately 1 cubic yard. F006 waste water treatment sludge. Container was open, not labeled with the words, "Hazardous Waste," and not labeled with an accumulation date.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 52  
*Photo Filename* P6220145.JPG  
*Date/Time* 6/22/2010  
10:22:40 AM  
*Photographer* Jamie Paulin

## *Description*

WWT unit filter press. Approximately 1 cubic yard. F006 waste water treatment sludge. Container was open, not labeled with the words, "Hazardous Waste," and not labeled with an accumulation date.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 53  
**Photo Filename** P6220146.JPG  
**Date/Time** 6/22/2010  
10:24:14 AM  
**Photographer** Jamie Paulin

## Description

WWT unit filter press. Approximately 1 cubic yard. F006 waste water treatment sludge. Container was open, not labeled with the words, "Hazardous Waste," and not labeled with an accumulation date.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 54  
*Photo Filename* P6220147.JPG  
*Date/Time* 6/22/2010  
10:31:38 AM  
*Photographer* Jamie Paulin

## *Description*

WWT unit. Liquid was located on the floor and within trench and sump pit located underneath WWT unit.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 55  
**Photo Filename** P6220148.JPG  
**Date/Time** 6/22/2010  
10:31:46 AM  
**Photographer** Jamie Paulin

## Description

WWT unit. Liquid was located on the floor.  
Blue material appeared to have leaked on the  
outside of the tank labeled as, "Sulfuric  
Acid."



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 56  
*Photo Filename* P6220149.JPG  
*Date/Time* 6/22/2010  
10:34:58 AM  
*Photographer* Jamie Paulin

## *Description*

WWT unit. Liquid and debris were located on the floor. Trench and sump pit were located underneath the unit.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 57  
**Photo Filename** P6220150.JPG  
**Date/Time** 6/22/2010  
10:35:10 AM  
**Photographer** Jamie Paulin

## Description

WWT unit. Liquid was located on the floor.  
300 gallon sump pit was located underneath  
the unit.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 58  
*Photo Filename* P6220151.JPG  
*Date/Time* 6/22/2010  
10:35:16 AM  
*Photographer* Jamie Paulin

*Description*

WWT unit.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 59  
**Photo Filename** P6220152.JPG  
**Date/Time** 6/22/2010  
10:36:20 AM  
**Photographer** Jamie Paulin

## Description

Zinc plating line. Process causes a continual spill of alkaline cleaner. Kitty litter was being placed on top of spilled material onto the floor on a continual basis. The kitty litter mix was being stored on the floor.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 60  
*Photo Filename* P6220153.JPG  
*Date/Time* 6/22/2010  
10:36:42 AM  
*Photographer* Jamie Paulin

## *Description*

Zinc plating line. Process causes a continual spill of alkaline cleaner. Kitty litter was being placed on top of spilled material onto the floor on a continual basis. The kitty litter mix was being stored on the floor.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 61  
*Photo Filename* P6220154.JPG  
*Date/Time* 6/22/2010  
10:41:10 AM  
*Photographer* Jamie Paulin

## *Description*

Material was being collected and stored within the containment pit below the zinc plating line.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 62  
*Photo Filename* P6220155.JPG  
*Date/Time* 6/22/2010  
10:41:18 AM  
*Photographer* Jamie Paulin

## *Description*

Material was being collected and stored within the containment pit below the zinc plating line. Material also was being collected and stored on the floor. Corrosion was evident on the surface of the floor.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 63  
*Photo Filename* P6220156.JPG  
*Date/Time* 6/22/2010  
10:42:50 AM  
*Photographer* Jamie Paulin

## *Description*

Material was being collected and stored within the containment pit below the zinc plating line. Material also was being collected and stored on the floor.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 64  
*Photo Filename* P6220157.JPG  
*Date/Time* 6/22/2010  
10:43:00 AM  
*Photographer* Jamie Paulin

## *Description*

Material was being collected and stored within the containment pit below the zinc plating line. Material also was being collected and stored on the floor. Corrosion was evident on the surface of the floor.



# Photographs for Mid City Plating Company CEI 6/22/2010

**Media: RCRA**

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*Disk Number* 1  
*Photo Number* 65  
*Photo Filename* P6220158.JPG  
*Date/Time* 6/22/2010  
10:45:26 AM  
*Photographer* Jamie Paulin

## *Description*

Chromate solution. "Working Solution."





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 66  
*Photo Filename* P6220159.JPG  
*Date/Time* 6/22/2010  
10:48:16 AM  
*Photographer* Jamie Paulin

*Description*

Laboratory water.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 67  
*Photo Filename* P6220160.JPG  
*Date/Time* 6/22/2010  
10:54:16 AM  
*Photographer* Jamie Paulin

## *Description*

Trench located on the floor in between rooms. Red un-identified red liquid was being stored within the trench. Pipes were located inside of the trench and were not connected from the exposed ends.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 68  
**Photo Filename** P6220161.JPG  
**Date/Time** 6/22/2010  
10:54:24 AM  
**Photographer** Jamie Paulin

## Description

Zinc plating line. Liquid was located on floor near the line. Hoses and equipment were also located on the floor.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 69  
**Photo Filename** P6220162.JPG  
**Date/Time** 6/22/2010  
10:54:46 AM  
**Photographer** Jamie Paulin

## Description

Trench located on the floor in between rooms. Red un-identified red liquid was being stored within the trench. Pipes were located inside of the trench and were not connected from the exposed ends.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

---

*Disk Number* 1  
*Photo Number* 70  
*Photo Filename* P6220163.JPG  
*Date/Time* 6/22/2010  
10:58:30 AM  
*Photographer* Jamie Paulin

## *Description*

Various equipment and raw material storage.  
Located on South/West side of facility.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

---

**Disk Number** 1  
**Photo Number** 71  
**Photo Filename** P6220164.JPG  
**Date/Time** 6/22/2010  
10:59:20 AM  
**Photographer** Jamie Paulin

## Description

Zinc plating line. Liquid was located on the floor near the plating line.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

---

**Disk Number** 1  
**Photo Number** 72  
**Photo Filename** P6220165.JPG  
**Date/Time** 6/22/2010  
10:59:28 AM  
**Photographer** Jamie Paulin

**Description**

Tank storage of "working solution."



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 73  
*Photo Filename* P6220166.JPG  
*Date/Time* 6/22/2010  
11:00:12 AM  
*Photographer* Jamie Paulin

## *Description*

Containment pit was located underneath zinc plating line. Kitty litter was being used to absorb spilled material.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 74  
*Photo Filename* P6220167.JPG  
*Date/Time* 6/22/2010  
11:00:46 AM  
*Photographer* Jamie Paulin

## *Description*

Liquids were being stored on the floor and within the containment pit of the zinc plating line.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 75  
*Photo Filename* P6220168.JPG  
*Date/Time* 6/22/2010  
11:02:42 AM  
*Photographer* Jamie Paulin

## *Description*

Liquid was located on the floor of the South/West of the facility.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 76  
**Photo Filename** P6220169.JPG  
**Date/Time** 6/22/2010  
11:03:32 AM  
**Photographer** Jamie Paulin

## Description

Un-identified material and equipment was located on the floor of the South/West side of the facility.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 77  
**Photo Filename** P6220170.JPG  
**Date/Time** 6/22/2010  
11:05:32 AM  
**Photographer** Jamie Paulin

## **Description**

Water tank located near the zinc plating line.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 78  
*Photo Filename* P6220171.JPG  
*Date/Time* 6/22/2010  
11:05:38 AM  
*Photographer* Jamie Paulin

*Description*



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 79  
**Photo Filename** P6220172.JPG  
**Date/Time** 6/22/2010  
11:05:44 AM  
**Photographer** Jamie Paulin

## Description

West side of zinc plating line. Red liquid was located in containment pit of line. Material was also being accumulated and stored on the floor near the line.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 80  
*Photo Filename* P6220173.JPG  
*Date/Time* 6/22/2010  
11:05:56 AM  
*Photographer* Jamie Paulin

## *Description*

Floor surrounding zinc plating line, located in the South/West room. Debris and material were located on the floor surrounding line.



# Photographs for Mid City Plating Company CEI 6/22/2010

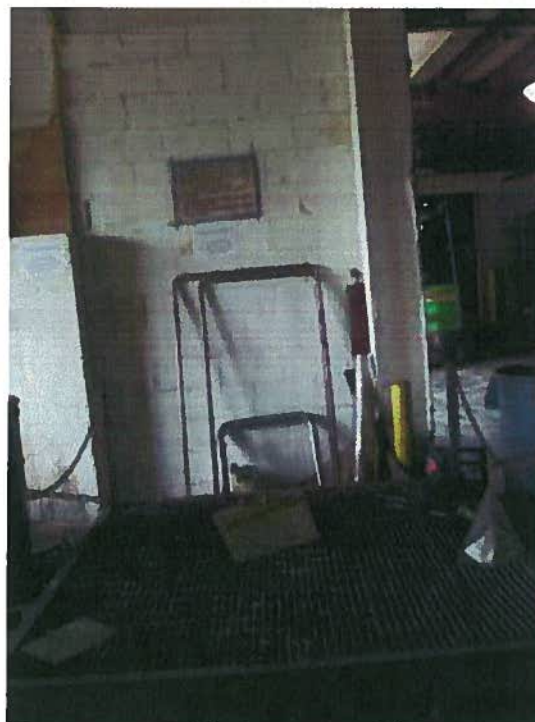
Media: RCRA

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**Disk Number** 1  
**Photo Number** 81  
**Photo Filename** P6220174.JPG  
**Date/Time** 6/22/2010  
11:08:14 AM  
**Photographer** Jamie Paulin

## Description

Hazardous waste storage area. No hazardous waste was being stored in this area at the time of the inspection.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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*Disk Number* 1  
*Photo Number* 82  
*Photo Filename* P6220175.JPG  
*Date/Time* 6/22/2010  
11:10:06 AM  
*Photographer* Jamie Paulin

## *Description*

F008 hazardous waste from plating process was being stored in a 55-gallon container as a satellite accumulation area (SAA) container. However, container was not being stored at or near point of operation and was not labeled correctly.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 83  
**Photo Filename** P6220176.JPG  
**Date/Time** 6/22/2010  
11:10:14 AM  
**Photographer** Jamie Paulin

## Description

Hazardous waste storage area. SAA 55-gallon container, F008, was not being stored at or near point of operation and was not labeled correctly.





# Photographs for Mid City Plating Company CEI 6/22/2010

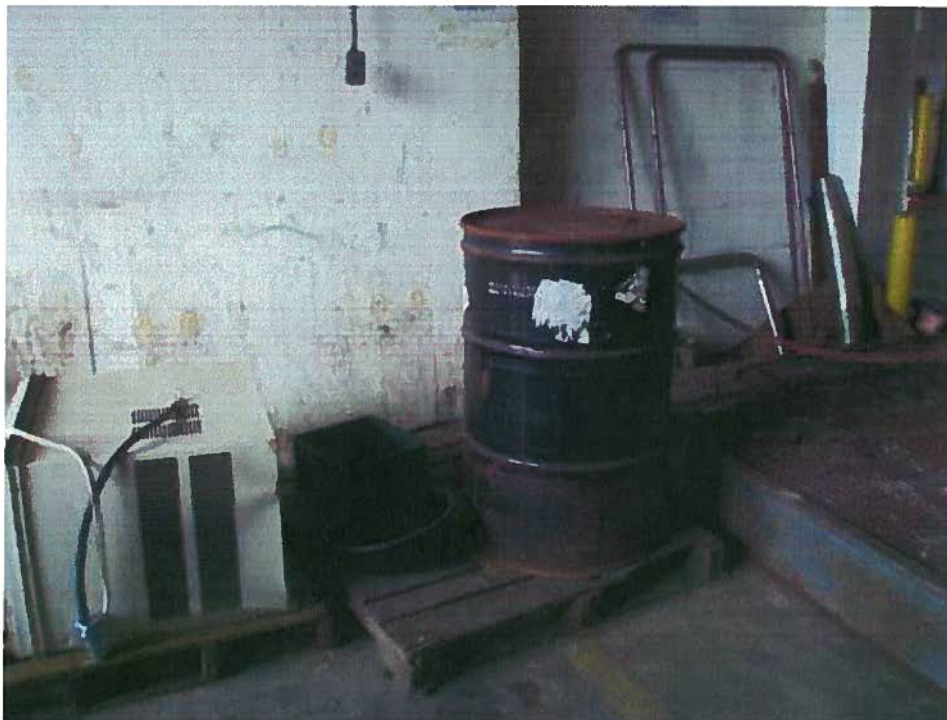
Media: RCRA

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**Disk Number** 1  
**Photo Number** 84  
**Photo Filename** P6220177.JPG  
**Date/Time** 6/22/2010  
11:12:58 AM  
**Photographer** Jamie Paulin

## Description

SAA 55-gallon container, F008, was not being stored at or near point of operation and was not labeled correctly.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 85  
**Photo Filename** P6220178.JPG  
**Date/Time** 6/22/2010  
11:13:56 AM  
**Photographer** Jamie Paulin

## Description

Roll-off container was located outside on the North/West side of facility. Roll-off was filled to top of container with F006 hazardous waste. Lid was not completely closed. No hazardous waste label, or date of accumulation was located on container.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 86  
**Photo Filename** P6220179.JPG  
**Date/Time** 6/22/2010  
11:14:04 AM  
**Photographer** Jamie Paulin

## Description

Roll-off container being stored outside on North/West side of facility. Lid was not completely closed on container. F006 hazardous waste was filled to top of container.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 87  
**Photo Filename** P6220180.JPG  
**Date/Time** 6/22/2010  
11:14:12 AM  
**Photographer** Jamie Paulin

## Description

Roll-off container was located outside on the North/West side of facility. Roll-off was filled to top of container with F006 hazardous waste. Lid was not completely closed. No hazardous waste label, or date of accumulation was located on container.



# Photographs for Mid City Plating Company CEI 6/22/2010

**Media: RCRA**

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**Disk Number** 1  
**Photo Number** 88  
**Photo Filename** P6220181.JPG  
**Date/Time** 6/22/2010  
11:20:34 AM  
**Photographer** Jamie Paulin

## **Description**

F006 hazardous waste was located on the outside of the roll-off container and on the ground.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 89  
**Photo Filename** P6220182.JPG  
**Date/Time** 6/22/2010  
11:20:46 AM  
**Photographer** Jamie Paulin

## Description

F006 hazardous waste was located on the outside of the roll-off container and on the ground.



# Photographs for Mid City Plating Company CEI 6/22/2010

**Media: RCRA**

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**Disk Number** 1  
**Photo Number** 90  
**Photo Filename** P6220183.JPG  
**Date/Time** 6/22/2010  
11:22:28 AM  
**Photographer** Jamie Paulin

## **Description**

F006 hazardous waste was located on the outside of the roll-off container and on the ground.



# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 91  
**Photo Filename** P6220184.JPG  
**Date/Time** 6/22/2010  
11:24:04 AM  
**Photographer** Jamie Paulin

## **Description**

Trench with a grate, located in maintenance room, on West side of facility, was located within the floor. Liquid was being stored within the pit. Cleaner collects inside of grate and is pumped to WWT unit.



# Photographs for Mid City Plating Company CEI 6/22/2010

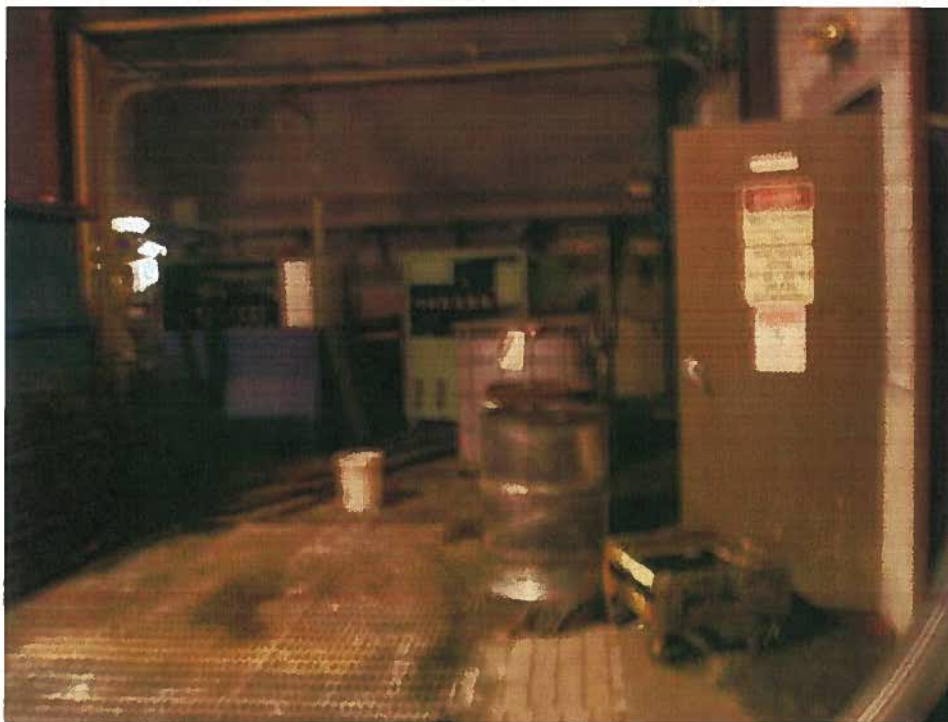
Media: RCRA

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**Disk Number** 1  
**Photo Number** 92  
**Photo Filename** P6220185.JPG  
**Date/Time** 6/22/2010  
11:24:10 AM  
**Photographer** Jamie Paulin

## **Description**

Trench with a grate, located in maintenance room, on West side of facility, was located within the floor. Liquid was being stored within the pit. Cleaner collects inside of grate and is pumped to WWT unit.





# Photographs for Mid City Plating Company CEI 6/22/2010

Media: RCRA

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**Disk Number** 1  
**Photo Number** 93  
**Photo Filename** P6220186.JPG  
**Date/Time** 6/22/2010  
11:28:40 AM  
**Photographer** Jamie Paulin

## **Description**

Trench with a grate, located in maintenance room, on West side of facility, was located within the floor. Liquid was being stored within the pit. Cleaner collects inside of grate and is pumped to WWT unit.





Mid-City Plating

6/22/10

## U.S. EPA Generator Checklist for Indiana

6/18/2010

**PART 262: Standards Applicable to Generators of Hazardous Waste**

#	40 CFR	NA = Not Applicable, NI = Not Inspected, OK = In Compliance, DF = Deficiency	NA	NI	OK	DF
<b>GENERAL</b>			<b>NA</b>	<b>NI</b>	<b>OK</b>	<b>DF</b>
1	262.11	Hazardous Waste Determination (characteristic, listed, TCLP, knowledge, exclusions)				
2	262.12(a)	EPA Identification Number (Generator must have ID number)			✓	
3	262.12(c)	Generator must not offer waste to transporters or facilities that have not received ID number.	✓			
<b>THE MANIFEST</b>			<b>NA</b>	<b>NI</b>	<b>OK</b>	<b>DF</b>
4	262.20	General Requirements (manifest to approved TSD/alt. TSD, SQG reclaim exemption on file)(all required info)	-			2
5	262.21	Manifest Acquisition (generator state 1st, consignment state 2nd)				
6	262.22	Number of Copies (generator, transporters, TSD, & 1 copy returned to generator)				
7	262.23	Manifest Use (signature & date: generator, transporter, TSD, keep copy)				
8	329 IAC 3.1-7-4	Indiana Manifest required for hazardous waste shipped to Indiana TSD Facilities				
9	329 IAC 3.1-7-6	Manifest copies available for review, submitted copies within 5 days after shipping				
<b>PRE-TRANSPORT REQUIREMENTS</b>						
<b>NOTE: If facility treats in &lt; 90 day tanks or containers, see 268.7</b>						
10	262.30, 31, 32, 33	Packaging, Labeling, Marking, Placarding (DOT regulations) (Only apply if waste is in the process of being transported)	✓			
<b>LARGE QUANTITY GENERATORS</b>			<b>NA</b>	<b>NI</b>	<b>OK</b>	<b>DF</b>
11	262.34(a)	90 Day accumulation limit: Generator may accumulate on-site for 90 days or less provided that:				✓
12	262.34(a)(1)	Waste is placed in tanks, containers, containment building, or drip pad				✓
13	262.34(a)(2)	Container marked with start of accumulation date				✓
14	262.34(a)(3)	Container/tank marked "Hazardous Waste"				✓
15	262.34(b)	30 Day extension				✓
<b>SATELLITE CONTAINERS</b>			<b>NA</b>	<b>NI</b>	<b>OK</b>	<b>DF</b>
16	262.34(c)(1)	Satellite accumulation (55 gal. maximum or one (1) quart acutely hazardous)				✓
17	262.34(c)(i)	i) Container must be closed when not in use, in good condition, and compatible with waste	✓			
18	262.34(c)(ii)	ii) marked "Hazardous waste" or other words, at or near process and under control of operator				✓

# U.S. EPA Generator Checklist for Indiana

6/18/2010

19	262.34(c)(2)	If exceed 55 gal., container must be marked with accumulation date and must be removed within 3 days	✓			
<b>SMALL QUANTITY GENERATOR</b> <i>✓ 26</i>			NA	NI	OK	DF
20	262.34(d)(e)(f)	SQG Requirements - 180 days or less (unless transported over 200 miles), quantity of hazardous waste on-site 6000 kg. or less, must follow:	✓			
21	262.34(d)(4)	Containers marked with start of accumulation date and words "Hazardous Waste"	✓			
22	262.34(d)(4)	Must also comply with 265 Subpart C and I. See pages 4 and 5.	✓			
23	262.34(d)(5)	i) Emergency coordinator identified	✓			
24	262.34(d)(5)	ii) Following info posted: emergency coordinator, emergency equipment location, phone numbers	✓			
25	262.34(d)(5)	iii) Employees must be familiar with handling and emergency procedures	✓			
26	262.34(d)(5)	iv) Respond to emergencies	✓			
<b>RECORD KEEPING</b>			NA	NI	OK	DF
27	262.40	RECORD KEEPING (3 yrs. for copy from manifests, TSD, biennial report, exception report, test results, waste analysis/determination, extension time for unresolved enforcement.)				?
28	262.41	Biennial Report (due March 1 even numbered years) (LQG ONLY)				↓
29	262.42	Exception Reporting (LQG: >35 days, if no return copy of manifest, contact TSD: >45 days report to IDEM, (SQG: >60 days) transportation report to IDEM)				↓
30	262.43	Additional Reporting, if required by Commissioner (concerning quantities and disposition of wastes in 40 CFR 261)				↓
31	262.44	SQG Recordkeeping Requirements (keep records for 3 years: manifests, exceptions, waste determination/analysis)				↓
<b>EXPORTS</b>			NA	NI	OK	DF
32	262.52	General Requirements (notify EPA, accepted by receiving country, EPA consent)	✓			
33	262.53	Notification of Intent to Export	✓			
34	262.54	Special Manifest Requirements for Primary Exporters	✓			
35	262.55	Exception Reports (>45 days from US departure, >90 days from receipt by foreign source/waste returned to US)	✓			
36	262.56	Annual Reports (March 1 annually for waste: types, quantity, frequency, destination, waste reduction send to EPA)	✓			
37	262.57	RECORD KEEPING (3 years for intent to export, EPA acknowledgments, confirmation of delivery, and annual reports)	✓			
<b>IMPORTS OF HAZARDOUS WASTE</b>			NA	NI	OK	DF
38	262.60	Hazardous Waste Imports (use consignment state's manifest)	✓			

# U.S. EPA Generator Checklist for Indiana

6/18/2010

		<b>TSD STANDARDS APPLICABLE TO GENERATORS</b>	NA	NI	OK	DF
		<b>GENERAL FACILITY STANDARDS (NA for SQG)</b>				
39	262.34 / 265.16(a)	Personnel Training (Program Adequacy)				✓
40	262.34 / 265.16(b)	Personnel received training within six (6) months				✓
41	262.34 / 265.16(c)	Personnel received annual review				✓
42	262.34 / 265.16(d)	Training Documents: job titles, job description, type of training, training records				✓
		<b>PREPAREDNESS AND PREVENTION</b>	NA	NI	OK	DF
43	262.34 / 265.31	Maintenance & Facility Operation(must be maintained & operated to minimize possibility of release)				✓
44	262.34 / 265.32	Required Equipment (a. Internal alarm/communication system b. External/telephone communication c. Fire extinguishers and spill control equipment d. water/foam)				2.
45	262.34 / 265.33	Testing & Maintenance of Equipment				
46	262.34 / 265.34	Communication & Alarm Access			✓	
47	262.34 / 265.35	Required Aisle Space (to allow movement of spill control and emergency equipment and inspections)				✓
48	262.34 / 265.37	Local Authority Arrangements (police, fire, hospital)				
		<b>CONTINGENCY PLAN &amp; EMERGENCY PROCEDURES (NA for SQG)</b>	NA	NI	OK	DF
49	262.34 / 265.51	Contingency Plan for Facility			✓	
50	262.34 / 265.52	Contingency Plan Content (SPCC plan, local arrangements, emergency coordinator, equipment list, evacuation plan, etc.)				
51	262.34 / 265.53	Contingency Plan Available (on-site, local distribution)				
52	262.34 / 265.54	Contingency Amendments (when regulations change, if plan fails, when facility makes changes)				
53	262.34 / 265.55	Emergency Coordinator available				
54	262.34 / 265.56	Emergency Procedures followed				
		<b>USE &amp; MANAGEMENT OF CONTAINERS</b>	NA	NI	OK	DF
55	262.34 / 265.171	Container Condition (If not in good condition or leaking, must transfer waste or manage in some other way)				✓

# U.S. EPA Generator Checklist for Indiana

6/18/2010

56	262.34 / 265.172	Waste Compatibility with Container				2.
57	262.34 / 265.173	Container Management (closed/manged to prevent leaks)				✓
58	262.34 / 265.174	Inspections (weekly)				2.
59	262.34 / 265.176	Ignitable/Reactive Waste (50 ft. set back)	✓			
60	262.34 / 265.177	Special Requirements for Incompatible Waste (physical separation/container compatibility)				2.
<b>LAND DISPOSAL RESTRICTIONS</b>			<b>NA</b>	<b>NI</b>	<b>OK</b>	<b>DF</b>
61	268.3	Dilution prohibited as substitute for adequate treatment				2.
62	268.7	Waste Analysis, Recordkeeping (LDR Notifications: waste code, whether it is a wastewater or non-wastewater, waste constituents to be monitored if monitoring will not include all regulated constituents, subcategory if applicable, and manifest number.)				✓
63	268.7 (a)(4)	Treatment in 90-day tanks/containers requires waste analysis plan and testing frequency, filed with Regional Administrator (IDEM), certification of shipment, retained copies on-site (5 yrs.), notifications include: EPA ID #, treatment standards with 5 letter code, and manifest number				2.
64	268.7(a)(7)	Notifications must be kept on-site for five (5) years				2.
65	268.9	Listed and characteristic waste codes assigned for listed waste exhibiting characteristic				2.
66	268.42	Alternative treatment specified for lab packs, mixed waste: most stringent standards				2.
67	268.45	Treatment standards for hazardous debris				2.
<b>OTHER</b>			<b>NA</b>	<b>NI</b>	<b>OK</b>	<b>DF</b>
68	IC 13-30	Release of contaminants to environment				2.
69	IAC 3.1-7-8	Facility has waste minimization program as certified on manifest				2.
70	IC 13-30-2-1 (9)	Does facility have any processes or activities (e.g. waste piles, incinerators, land disposal) which require a permit or interim status? If so, please identify below:				2.